Young Conaway Stargatt & Taylor, LLP

Rockefeller Center 1270 Avenue of the Americas Suite 2210 New York, NY 10020

Telephone: (212) 332-8840 Facsimile: (212) 332-8855

Matthew B. Lunn Justin P. Duda

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

CRÉDIT AGRICOLE (SUISSE) S.A., and CRÉDIT AGRICOLE S.A., a/k/a BANQUE DU CRÉDIT AGRICOLE,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 12-01022 (SMB)

STIPULATION FOR EXTENSION OF TIME TO RESPOND AND ADJOURNMENT OF PRETRIAL CONFERENCE

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which defendants Crédit Agricole (Suisse) S.A. and Crédit Agricole S.A., a/k/a Banque du Crédit Agricole (collectively, the "Defendants"), may move, answer, or otherwise respond to the complaint (the "Complaint") filed in the above-captioned adversary proceeding (Adv. Pro. No. 12-01022 (SMB)) (the "Adversary Proceeding") is extended up to and including December 17, 2014. The pre-trial conference will be adjourned from January 28, 2015 at 10:00 a.m. to February 25, 2015 at 10:00 a.m.

The purpose of this stipulated extension is to provide additional time for the Defendants to answer, move against, or otherwise respond to the Complaint. This is the thirteenth such extension. Nothing in this stipulation is a waiver of the Defendants' right to request from the Court a further extension of time to answer, move, or otherwise respond and/or the Trustee's right to object to any such request.

The parties to this Stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction. By entering into this Stipulation, the Defendants are not making a general appearance, nor have they consented to jurisdiction or waived any right to a jury trial.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Dkt. No. 7037) in the above-captioned case (Adv. Pro. No. 08-01789 (SMB)).

Dated: November 13, 2014

YOUNG CONAWAY STARGATT & TAYLOR, LLP

By: <u>/s/ Matthew B. Lunn</u>
Matthew B. Lunn
Justin P. Duda
Rockefeller Center
1270 Avenue of the Americas, Suite 2210
New York, New York 10020

Telephone: (212) 332-8840 Facsimile: (212) 332-8855 Email: *mlunn@ycst.com*

Attorneys for Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC CLEARY GOTTLIEB STEEN & HAMILTON LLP

By: <u>/s/ Lawrence B. Friedman</u> Lawrence B. Friedman Lisa Vicens One Liberty Plaza New York, New York 10006 Telephone: (212) 225-2000

Telephone: (212) 225-2000 Facsimile: (212) 225-3999 Email: <u>lfriedman@cgsh.com</u>

Attorneys for the Defendants